UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOHN DOE,))
Plaintiff,)
v.	Civil Action No
THE FEDERAL REPUBLIC OF GERMANY, AND THE BUNDESKRIMINALAMT OF THE FEDERAL REPUBLIC OF GERMANY,)
Defendants.)))

PLAINTIFF'S EX PARTE MOTION FOR ALTERNATIVE SERVICE

Pursuant to 28 U.S.C. § 1608(a)(1), Plaintiff John Doe hereby requests permission to serve Defendant The Federal Republic of Germany and Defendant The Bundeskriminalamt of the Federal Republic of Germany ("BKA") via alternative means.

Plaintiff's safety and security is of the utmost concern. Conventional service of process would potentially expose a route for others to identify Plaintiff. Existing secure and reliable communication channels with the defendants in this case have already been established, and those channels have been used to discuss this legal action. Furthermore, Plaintiff is already aware of the identity of Defendants' counsel regarding this matter.

Therefore, Plaintiff asks the Court for permission to serve the Defendants in this action via the same secure electronic means that Plaintiff has already employed to communicate with Defendants in the past as described in the Complaint, as well as via e-mail to Defendants' known counsel in this matter.

Dated: July 24, 2023

Respectfully submitted,

/s/John Doe
John Doe
doevgermanylitigation@protonmail.com